



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8

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SEP 30 2015

Ref: EPR-N

Mr. Will Meeks, Assistant Regional Director
National Wildlife Refuge System
U.S. Fish and Wildlife Service
P.O. Box 25486
Denver Federal Center
Denver, Colorado 80225-0486

Re: Rocky Mountain Arsenal National Wildlife Refuge Final Environmental Impact Statement,
CEQ# 20150252

Dear Mr. Meeks:

The U.S. Environmental Protection Agency Region 8 has reviewed the *Rocky Mountain Arsenal National Wildlife Refuge Final Environmental Impact Statement* (EIS) prepared by the U.S. Fish and Wildlife Service (the Service). Our comments are provided for your consideration pursuant to our responsibilities and authorities under Section 102(2)(C) of the National Environmental Policy Act (NEPA), 42 U.S.C. Section 4332(2)(C), and Section 309 of the Clean Air Act, 42 U.S.C. Section 7609.

Project Background and Description

The Rocky Mountain Arsenal (RMA) was a chemical munitions plant during World War II. After the war, Shell Oil Company leased buildings at the RMA and produced chemical insecticides until 1982. Chemical weapons production ended in the 1970s and in 1987, the RMA was placed on the EPA's National Priority List (i.e., the Superfund) after an investigation of site contamination. Congress passed the Rocky Mountain Arsenal National Wildlife Refuge (RMANWR) Act in 1992, establishing the RMA as a national wildlife refuge and declaring that once cleanup was complete and certified by the EPA, the Service would assume management responsibility. The refuge was officially established in 2004 with the initial transfer of almost 5,000 acres from the Army to the Service. At present, the Service manages almost 16,000 acres and the Army retains approximately 1,000 acres for ongoing operation, maintenance and monitoring activities.

The Service is required by the National Wildlife Refuge System Improvement Act of 1997 to update their comprehensive conservation plans (CCPs) every 15 years and that is the purpose of this NEPA document. The Service described and analyzed four alternatives, including the no action alternative, for managing the refuge. The preferred alternative, Alternative C – Urban Refuge, is the most ambitious, would increase the visibility of the refuge within the Denver metropolitan area and connect more people with nature.

EPA Comments

Thank you for responding to most of our comments on the Draft EIS. We particularly appreciate that the changes between the Draft EIS and the Final EIS were clearly marked and easily discernible to the reader. Following are our remaining concerns.

The EPA does not believe that the Service's response to our comment (1-6) on page 173 adequately addresses our concern. Our issue is that altering the Texas Crossing might impact the site's hydrology, which is prohibited in RMA's land use restrictions. We recommended that the Service commit to conducting a hydrological evaluation to evaluate the potential for impacting groundwater recharge, flow, monitoring, extraction, or treatment prior to making any alterations to the existing site configuration.

Also, for future NEPA processes in which the Service would like the EPA to be a cooperating agency, please direct the request to EPA Region 8's NEPA Compliance and Review Program. Thank you for the opportunity to provide comments on the Rocky Mountain National Wildlife Refuge Final EIS. If you have any questions or would like to discuss our comments, please contact me at 303-312-6704 or Carol Anderson of my staff at 303-312-6058.

Sincerely,



Philip S. Strobel
Director, NEPA Compliance and Review Program
Office of Ecosystems Protection and Remediation

cc by email: Bernardo Garza, U.S. Fish and Wildlife Service



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